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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

EPIC GAMES, INC.

Case No. 4:20-cv-05640-YGR-TSH

Plaintiff, Counter-defendant

**EXHIBIT A (REDACTED) TO
DECLARATION OF MARK A. PERRY IN
SUPPORT OF APPLE INC.'S STATEMENT
IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL**

APPLE INC

The Honorable Thomas S. Hixson

Defendant, Counterclaimant

EXHIBIT A

(Redacted)

Batch Number of Parent Document (Folder Title)	Number	Production Beginning Date	Production End Date	Custodians	DocDate	DocTime	From	To	Cc	Bcc	Subject	OriginalName	Redact or Withhold	PrivilegeType	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees acting at the direction of counsel	Special Master Determinations (Prv Yes; Prv - No)	Optional Special Master Notes
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PRIV-APL-EG_00163956	1787	PRIV-APL-EG_00163956	PRIV-APL-EG_00163957	De Wilde, Geoff; Robbin, Jeff; Kim, Timothy; Bavaro, Sam; Van Tassel, Dave; Kosmynska, Trystan; Friedland, Zach; Thai, Ann; Hawthorne, Amy; Kirtane, Latika; Barton, Nate; Fischer, Matt; Oliver, Carson; Washburn, Tanya; Fedenghi, Craig	2023-12-07	23:08:34						DMA_Review_Guideline_Analysis_10.25.22_v1.numbers	withhold	WorkProduct	Document reflecting work product from counsel regarding injunction compliance requirements for user design and interface		Document reflecting legal advice from Apple legal	NO	THE LOG ENTRY AND THE DOCUMENT DO NOT DEMONSTRATE THAT THIS DOCUMENT REFLECTS WORK PRODUCT
PRIV-APL-EG_00166278	1800	PRIV-APL-EG_00166278	PRIV-APL-EG_00166278	De Wilde, Geoff; Kim, Timothy; Kirtane, Latika; Vijayakirthi, Kunal	2024-05-29	18:17:19						Epic v. Apple - Potential Injunction Compliance Requirements - Chart_107469801_1.docx	withhold	AttorneyClient; WorkProduct	Document providing legal advice from counsel regarding injunction compliance and U.S. Link Entitlement program eligibility prepared in anticipation or furtherance of litigation	Document is withheld as it reflects counsel's assessment on injunction compliance relating to Epic litigation.	Document reflecting legal advice from Apple legal	YES AND NO	DOCUMENT SHOULD BE PRODUCED WITH WORK PRODUCT OR LEGAL ADVICE REDACTED
PRIV-APL-EG_00190369	3989	PRIV-APL-EG_00190369	PRIV-APL-EG_00190370	Goldberg, Marni	2023-07-20	18:35:16	Marni Goldberg	Alanna Rutherford	Heather Grenier	Jennifer Brown	Re: Earnings Q&A -- Epic	20230720-1135 Re: Earnings Q&A -- Epic.eml	Withhold	AttorneyClient	Email reflecting legal advice from counsel regarding the Epic v. Apple litigation and attorney review of communications legal strategy	Information regarding Epic v. Apple litigation and attorney review of communications legal strategy	Jennifer Brown (Apple in-house counsel); Heather Grenier (Apple in-house counsel); Alanna Rutherford (Apple in-house counsel)	YES AND NO	DOCUMENT SHOULD BE PRODUCED WITH LEGAL ADVICE REDACTED
PRIV-APL-EG_00194770	4513	PRIV-APL-EG_00194770	PRIV-APL-EG_00194775	Guebert, Jeff	2021-11-15	19:15:33	Blaise Margherita	Jeff Guebert	Ling (Legal) Lew	Zach Friedland	Re: Project Michigan: PLA Update and TestFlight	20211115-1915 Re: Project Michigan- PLA Update and TestFlight.eml	Withhold	AttorneyClient; WorkProduct	Email chain providing legal advice from counsel regarding injunction compliance and U.S. Link Entitlement program eligibility, prepared in anticipation or furtherance of litigation	Request for legal advice to in-house counsel regarding requirements with compliance of injunction and response with legal advice from in-house counsel	Ling Lew (Apple in-house counsel); Sean Cameron (Apple in-house counsel); Jason Cody (Apple in-house counsel)	YES AND NO	DOCUMENT SHOULD BE PRODUCED WITH LEGAL ADVICE REDACTED
PRIV-APL-EG_00195630	4570	PRIV-APL-EG_00195630	PRIV-APL-EG_00195635	Kosmynska, Trystan; Guebert, Jeff; Hawthorne, Amy; Friedland, Zach; Kirtane, Latika; Van Tassel, Dave	2021-11-15	19:15:33	Blaise Margherita	Jeff Guebert	Ling (Legal) Lew	Zach Friedland	Re: Project Michigan: PLA Update and TestFlight	20211115-1916 Re: Project Michigan: PLA Update and TestFlight.eml	Withhold	AttorneyClient	Email chain providing legal advice from counsel regarding injunction compliance requirements for link format and buttons		Ling Lew (Apple in-house counsel); Sean Cameron (Apple in-house counsel); Jason Cody (Apple in-house counsel)	YES AND NO	DOCUMENT SHOULD BE PRODUCED WITH LEGAL ADVICE REDACTED. NON-LAWYER TO NON-LAWYER COMMUNICATION RE: FUNCTIONALITY IS NOT LEGAL ADVICE.